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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

## **COUNCIL OF PRESIDENTS**

c/o National Committee on Pay Equity  
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January 5, 1998

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William E. Kennard  
Chairman  
Federal Communications Commission  
1919 M. St., N.W. - Room 814  
Washington, D.C. 20554

Dear Chairman Kennard,

The Council of Presidents is a coalition of more than 100 women's organizations who collectively work for women's rights. The organizations of the Council are listed on the attachment to this letter.

We are writing to you today to let you know that the broad women's community strongly supports the FCC's EEO Rules. Particularly in light of the following, we believe that diversity is important in the powerful communications media and that broadcasters should be held to a high standard in their EEO efforts.

❖ In 1997, there continues to be a serious wage gap between men and women. Women only earn 74¢ for every dollar that the average man earns.

❖ While women held 35.5% of management positions, according to the FCC employment report, that figure includes every "manager" from an office manager to a senior Vice President or CEO.

❖ Women still occupy the majority -- 88% -- of low-rung office and clerical posts, and women have overtaken men in lower-level sales positions, 53% compared to 47% according to the FCC annual employment report.

❖ Behind the Scenes: According to a San Diego State University Study of the 1995-1996 prime-time season:

→ Women comprise only 16% of executive producers; 68% of shows have no female executive producers.

→ Women comprise only 18% of producers; 68% of shows have no female executive producers.

→ Women comprise only 18% of directors; 89% of shows have no female directors.

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→Women comprise 22% of writers; 72% of shows have no female writers.

→When shows employ one or more female executive producers, producers, directors, or writers, female characters more often speak, introduce topics of conversation, have the last word, and advise others.

→Whites accounted for slightly more than 80% of all characters. Only 8% of characters were non-white. In fact, in the 1995-1996 season, viewers were about as likely to see an Asian or female Hispanic character as they were an extra-terrestrial.

These statistics are alarming and unacceptable especially as new frontiers in telecommunications are being developed. There are still too few women in decision-making posts who have line authority. We recognize the power of the media to inform and educate the public, and its part in providing role models. How they fulfill that role affects the communications industry, and moreover, affects how women are regarded by the viewing and listening public. We view as serious the responsibility to portray women accurately, as we know you do.

For these reasons, we urge the FCC to resist efforts by broadcasters to eliminate their obligations to merely make *efforts* to recruit women and minorities. We consider the desire of broadcasters to eliminate these obligations, especially the challenge to the constitutional basis for *mere outreach* to women, as wholly unreasonable. In particular, should the challenge being brought by the Lutheran Church-Missouri Synod prevail, a negative precedent for all forms of affirmative action could be set. At the same time, women and people of color are under attack as broadcasters seek to have the FCC eliminate the rules commitment to women and minorities under the guise of streamlining.

We are aware that broadcasters have resisted and rejected attempts by women's groups and minority groups to compromise on new rules that would insure continued opportunities for women and minorities in communications.

We urge the FCC to vigorously defend and withstand these attacks against merely recruiting women and minorities. We strongly believe such attacks would signal the beginning of a reversal of important gains that have been made by women.

Sincerely,



Susan Bianchi Sand  
Chair

cc: Richard R. Zaragoza, Esq., Fisher Wayland Cooper Leader  
David Honig, Counsel

## **COUNCIL OF PRESIDENTS - Member Organizations**

9 to 5: National Association of Working Women  
African American Women's Clergy  
Alpha Kappa Alpha Sorority, Incorporated  
American Association of University Women  
American Medical Women's Association  
American Nurses Association  
American Women in Radio & TV  
Association of Junior Leagues International  
Benere Ballentine  
Black Women United for Action  
Black Women's Agenda  
Business and Professional Women/USA  
CWI  
Catholics for a Free Choice  
Center for the Advancement of Public Policy  
Center for Ethics in Action  
Center for Policy Alternatives  
Center for Reproductive Law and Policy  
Center for Women, Men & the Social Evolution  
Center for Women Policy Studies  
Child Care Action Campaign  
Church Women United  
Clearinghouse on Women's Issues  
Coalition for America's Children  
Coalition for Labor Union Women  
Commission on the Advancement of Women Inter Action  
Cornell University/Institute for Women & Work  
Dialogue on Diversity Inc.  
Economists' Policy Group on Women's Issues  
Equal Rights Advocates  
Equal Rights Amendment Summit  
Federally Employed Women  
Financial Women International  
General Federation of Women's Clubs  
Girls Incorporated  
Gray Panthers Project Fund  
HADASSAH  
Hispanic Women's Council  
Inet for Women  
Institute for Health & Aging/University of California  
Institute for Women's Policy Research  
International Black Women's Wages for Housework Campaign  
International Wages for Housework Campaign  
Jewish Women Coalition  
Jewish Women International  
Jewish Women's Caucus/NWCC  
League of Women Voters  
MANA, A National Latina Organization  
Ms. Foundation  
Mautner Project for Lesbians with Cancer  
McAuley Institute/Women & Housing Task Force

McLean Satellite Communications Incorporated  
 Mount Vernon College  
 Na'Mat USA  
 NAWE: Advancing Women in Higher Education  
 National Alliance for Caregiving  
 National Abortion Federation  
 National Abortion & Reproductive Rights Action League  
 National Association of Commissions for Women  
 National Association for Female Executives  
 National Association for Girls & Women in Sports  
 National Association of Negro BPW, Inc.  
 National Black Women's Health Project  
 National Center for the Early Childhood Work Force  
 National Commission of Working Women  
 National Committee on Pay Equity  
 National Committee for Responsible Philanthropy  
 National Committee on Women's Issues  
 National Conference of Puerto Rican Women  
 National Council of Jewish Women  
 National Council of Negro Women  
 National Council of Women of the U.S.  
 National Foundation for Women Legislators, Inc.  
 National Hispana Leadership Institute  
 National Hook-up of Black Women, Inc.  
 National Organization for Women  
 National Political Congress of Black Women  
 National Puerto Rican Coalition  
 National Women's Conference Center  
 National Women's Conference Committee  
 National Museum of Women's History  
 National Women's Hall of Fame  
 National Women's Health Resource Center  
 National Women's Health Network  
 National Women's Law Center  
 National Women's Party  
 National Women's Political Caucus  
 National Women's Studies Association  
 Network  
 New Ways to Work  
 NOW Legal Defense & Education Fund  
 Older Women's League  
 Organization of Chinese-American Women  
 Planned Parenthood Federation of America  
 Radcliffe Public Policy Institute  
 Religious Coalition for Abortion Rights  
 Religious Network for Equality for Women  
 Sigma Gamma Rho Sorority, Inc.  
 Sociality for the Advancement of Women's Health Research  
 Society for the Advancement of Women's Health Research  
 Soroptimist International of the Americas  
 The Deciding Vote  
 The Feminist Institute, Inc.  
 The Feminist Majority Foundation  
 The Links, Inc.

The National Association of Women Business Owners  
 The Women Activist Fund, Inc.  
 The Women in Communications Foundation  
 U.S. Committee for the United Nations Fund for Women (UNIFEM/USA)  
 United Methodist Church  
 Voters for Choice Education Fund  
 Washington Women's Television Network  
 Wider Opportunities for Women  
 Wiser Women's Institute for A Secure Retirement  
 Woman's National Democratic Club  
 Women Employed  
 Women Executives in State Government  
 Women for Affirmative Action  
 Women, Law & Development International  
 Women Leaders ONLINE  
 Women for Meaningful Summits  
 Women for Racial & Economic Justice  
 Women in Technology International  
 Women, Men and Media  
 Women Work!  
 Women's Action Alliance, Inc.  
 Women's Action for New Directions  
 Women's Bureau  
 Women's Business Coalition, PAC  
 Women's Business Development Center  
 Women's Campaign Fund  
 Women's Environmental & Developmental Organization  
 Women's Foreign Policy Group  
 Women's Institute for Freedom of the Press  
 Women's International League for Peace and Freedom  
 Women's International Public Health Network  
 Women's Law & Public Policy Fellowship Program  
 Women's Legal Defense Fund  
 Women's Party Corporation  
 Women's Policy, Inc.  
 Women's Research & Education Institute  
 YWCA of the U.S.A.  
 Zeta Phi Beta Sorority

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